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Attorneys For: Defendant NORTHSTAR LOCATION SERVICES, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NICOLE DIANE LA CARIA, on behalf of herself
and all others similarly situated;

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC, A
New York limited liability company, and JOHN
DOES 1-10.

Defendant.

CASE NO.: 2:18-cv-00317-GMN-
GWF

Honorable Gloria M. Navarro
Magistrate Judge George Foley, Jr.

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT NORTHSTAR
LOCATION SERVICES, LLC TO
FILE ITS OPPOSITION TO
PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

[L.R. IA 6-1(b)]

Current deadline: January 11, 2019
Proposed deadline: January 25, 2019

TO THIS HONORABLE COURT:

Defendant Northstar Location Services, LLC ("Northstar"), by and through its undersigned counsel of record, Craig J. Mariam of the law firm of Gordon Rees Scully Mansukhani, LLP, and Plaintiff Nicole Diane LaCaria, by and through her undersigned counsel of record, Keren Gesund of the law firm of Gesund & Paillet, LLC, hereby stipulate and agree to extend the time for Northstar to file its Opposition to Plaintiff's Partial Motion for Summary Judgment (ECF No. 55), filed on December 21, 2018, from the current deadline of January 11,

2019 to January 25, 2019. The reason for the requested extension is that Plaintiff's Motion for Partial Summary Judgment was filed on the eve of a holiday week and without advanced notice. See Declaration of Craig J. Mariam in Support of Joint Stipulation for Extension of Time for Northstar to File Its Opposition to Plaintiff's Motion for Summary Judgment ("Mariam Decl."), ¶ 3. As such, due to holiday travel and family commitments, defense counsel needs additional time to prepare the Opposition and obtain the necessary client declarations from Northstar's corporate representatives, who likewise have travel and family commitments during late December 2018 and early January 2019. *Id.*, ¶ 4. A brief 14-day extension is therefore necessary in order to avoid substantial prejudice resulting from having to prepare the Opposition and to obtain the requisite client declarations on short notice during a holiday week. *Id.*, ¶ 5.

This is the first stipulation for extension of time for Northstar to file its Opposition to Plaintiff's Motion for Summary Judgment.

IT IS SO STIPULATED.

Respectfully submitted,

DATED this 28th day of December 2018.

DATED this 28th day of December 2018.

**GORDON REES SCULLY
MANSUKHANI, LLP**

GESUND & PAILET, LLC

/s/ Craig J. Mariam
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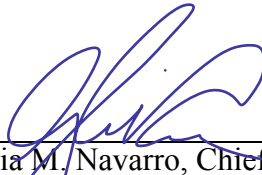
/s/ Keren Gesund
Keren Gesund, Esq.
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Attorney for Plaintiff
Nicole Diane LaCaria

ORDER

Pursuant to the foregoing Stipulation, Defendant Northstar Location Services, LLC's time to respond to Plaintiff's Motion for Partial Summary Judgment (ECF No. 55) is extended to January 25, 2019.

IT IS SO ORDERED.

DATED this 8 day of January, 2019.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

Gordon Rees Scully Mansukhani, LLP
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